② 013

PATENT

Docket: CU-3620

NOV 0 8 2006

Application Serial No. 10/631,877 Reply to Office Action of June 14, 2006

REMARKS

Reconsideration is respectfully requested.

Claims 11-23 were pending in the present application before this amendment.

By the present amendment, claims 11-23 are amended; and new claims 24-29 are added. No new matter has been added.

In the Office Action, claim 16 has been objected to due to a typographical error. The Applicant has subsequently removed this typographical error by amending claim 16. Accordingly, this objection to claim 16 should be withdrawn.

In the Office Action, claims 11-15 and 20-23 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. 4,744,741 (Glover). The "et al." suffix is omitted in the reference name. The Applicant **traverses this rejection in part** because the presently amended claim set has claimed elements that are not taught by Glover.

The Applicant has subsequently amended base claim 11 by clarifying that the

- the front and middle parts are alignable together to form a perimeter of a first
cavity substantially bounded by the front and middle profiles when paired
together —. Claim 11 now requires that when the front and middle profiles are
paired together — a sub-unit molded product comprising a first shape having a
front complementary profile and a middle complementary profile can be
formed by filling the first cavity with a substrate —. Furthermore, when — the
back and middle parts are alignable together when the sub-unit molded
product is attached to the middle part to form a perimeter of a second cavity
substantially bounded by the middle complementary profile and the back
profile when paired together—. Therefore when the middle complementary profile
and the back profile are paired together—an assembled object comprising a
second shape having the front complementary profile and a back

Application Serial No. 10/631,877 Reply to Office Action of June 14, 2006 PATENT Docket: CU-3620

complementary profile can be formed by filling the second cavity with a substance that merges with the sub-unit molded product—.

The Glover teaches "a symmetrical thermoplastic body or sleeve 1 with a central internal register rib 2, and an internally mounted injection molded elastomeric sealing ring 3 in each end..." (Glover col. 3, lines 58-61). That is, Glover teaches a device that is configured to make separate molded components and, after a rotation of a mold, then these molded components can be **fused to each other** to make a product. The Applicant respectfully contends that this Glover apparatus/method is unlike the presently claimed invention (base claim 11), in that the present invention requires a device to be configured to first make a sub-unit molded product and, following a rotation of mold, an assembled object can then be made by molding, **not** simply fusing them together, another component onto and around a portion of the sub-unit molded product. In summary Glover teaches a device configured to make two or more pieces and then simply fusing these pieces together. In contrast the present invention requires a device configured to make a sub-unit molded product and then configured to pour another mold around this sub-unit molded product to make a singular geometric shape comprising the final assembled object.

In summary, the present invention requires an apparatus having mold apparatus parts that have front, back and middle profiles in which the mold apparatus parts are configured to be paired together to form a perimeter of a first cavity defined by the mated surfaces of the front and middle profiles in which this first cavity can then be filled to make a sub-unit molded product. The presently claimed apparatus is configured so that this sub-unit molded product is retained on either the front or middle profile of one of the mold apparatus parts in which the mold apparatus part is then alignable so that the back profile and the sub-unit molded

Application Serial No. 10/631,877 Reply to Office Action of June 14, 2006 PATENT Docket: CU-3620

product are paired together to form a perimeter of a second cavity. Again, this presently claimed invention is configured so that this second cavity can then be filled with some substance which can then result in forming onto the sub-unit molded product which results in making the final assembled object.

Therefore, the Applicant respectfully asserts that this anticipation rejection based on Glover should be withdrawn because Glover does not teach each and every claimed limitation of the present invention as required in the base claim 11. Since dependent claims further limit their respective base claim, then the Applicant respectfully asserts that this rejection of claims 11-15 and 20-23 should be withdrawn.

In the Office Action, claims 16 and 17 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Glover.

The Applicant respectfully traverses this rejection in part because the Glover reference does not teach, motivate or suggest all of the required elements of the presently claimed invention. The above arguments are equally applicable here in that the Glover reference does not teach each and every claimed limitation of the present invention. Furthermore, since Glover teaches making separate pieces and then fusing these pieces together, then Glover doesn't teach, suggest or motivate the presently claimed apparatus that is configured to make a sub-unit molded product and then to directly mold onto this sub-unit molded product another shape to eventually form a final assembled object. Therefore, this obviousness rejection of claims 16 and 17 should be withdrawn.

In the Office Action claims 18 and 19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Glover in view of Watanabe (U.S. 5,196,213).

The Applicant respectfully traverse this rejection in part because the Glover

Application Serial No. 10/631,877 Reply to Office Action of June 14, 2006 PATENT Docket: CU-3620

and Watanabe references, alone or in combination, do not teach, motivate or suggest all of the required elements of the presently claimed invention. The above arguments are equally applicable here in that the Glover reference does not teach each and every claimed limitation of the present invention. Furthermore, the Watanabe reference is used only to disclose a ball-screw mechanism ejector which does not cure the deficiency of Glover. Therefore, the Applicant respectfully contends that the Glover and Watanabe references, alone or in combination, do not teach, suggest or motivate all of the claimed elements of the present invention such as an apparatus that is configured to make a sub-unit molded product and then to mold onto this sub-unit molded product to form a final assembled object. Therefore, this obviousness rejection of claims 18 and 19 should be withdrawn.

In light of the foregoing response, all the outstanding objections and rejections are considered overcome. Applicant respectfully submits that this application should now be in condition for allowance and respectfully requests favorable consideration.

Respectfully submitted,

Date: NOVEMBER 8, 2006

Loren K. Thompson, Ph.D. Reg. #45,918

Ladas & Parry LLP

224 South Michigan Avenue

Chicago, Illinois 60604

(312) 427-1300